



SOCMA
SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION

201-15300

May 24, 2004

RETURN RECEIPT REQUESTED VIA E-MAIL, PLEASE

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-To-Know Program

Dear Administrator Leavitt:

The Metal Carboxylates Coalition (MCC), a High Production Volume (HPV) Chemical Challenge industry consortium under the Synthetic Organic Chemical Manufacturers Association (SOCMA) wishes to amend its commitment to the US HPV Challenge Program.

Per the original commitment submitted November 30, 1999 and subsequent amendments December 15, 1999 and December 19, 2002, member companies of the MCC are committed to making publicly available baseline health and environmental effects data for 19 of the 20 sponsored metal carboxylates. However, the MCC no longer wishes to use the category approach utilizing all 19 chemicals and will instead provide this data on an individual chemical basis or by the utilization of smaller categories.

The MCC has reorganized its operational structure to reflect the new chemical groups and testing needs of the sponsored metal carboxylates. Under separate cover, amended test plans for each of the sponsored chemicals will be submitted as demonstrated in the table below and will be sponsored by respective member companies:





CAS no.	Sponsored Chemical	Sponsoring Companies
3164-85-0 136-51-6	Hexanoic acid, 2-ethyl potassium salt Hexanoic acid, 2-ethyl calcium salt	Akcros Chemicals Ltd., ATOFINA, Crompton Corporation, Ferro Corporation, OM Group Americas, Pelron Corporation, The Shepherd Chemical Company, Troy Corporation
136-52-7	Hexanoic acid, 2-ethyl cobalt (+2) salt	OM Group Americas, The Shepherd Chemical Company, Troy Corporation
136-53-8	Hexanoic acid, 2-ethyl zinc salt	Akcros Chemicals Ltd., Baerlocher USA, Inc., Crompton Corporation, Ferro Corporation, OM Group Americas, The Shepherd Chemical Company
22464-99-9	Hexanoic acid, 2-ethyl zirconium salt	OM Group Americas, The Shepherd Chemical Company, Troy Corporation
301-10-0	Hexanoic acid, tin (2+) salt	ATOFINA, Rohm & Haas
61789-51-3	Naphthenic acids, cobalt salt	OM Group Americas, The Shepherd Chemical Company, Troy Corporation
12001-85-3	Naphthenic acids, zinc salt	Ferro Corporation, OM Group Americas, Ferro Corporation
27253-31-2 68955-83-9	Neodecanoic acid, cobalt salt Fatty acids, C9-C13-neo cobalt salts	OM Group Americas, The Shepherd Chemical Company
68457-13-6	Cobalt borate neodecanoate complexes	OM Group Americas, The Shepherd Chemical Company
71-48-7 1560-69-6	Cobalt acetate Propionic acid, cobalt 2+ salt	OM Group Americas, The Shepherd Chemical Company



CAS no.	Sponsored Chemical	Sponsoring Companies
4075-81-4	Propionic acid, calcium salt	Kemin Industries, OM Group Americas
61789-52-4 13586-84-0	Fatty acids, tall oil cobalt salt Cobalt stearate	OM Group Americas, The Shepherd Chemical Company
28987-17-9	Phenol, nonyl, barium salt	Akcros Chemicals, Inc., Baerlocher USA, Inc., Crompton Corporation, Ferro Corporation, OM Group Americas
300-92-5 637-12-7	Aluminum distearate Aluminum tristearate	Crompton Corporation, Ferro Corporation, The Shepherd Chemical Company

Based on information received from member companies and non-confidential information provided through the 2002 IUR Report, it is believed that barium stearate (CAS no. 6865-35-6) is no longer produced or imported in quantities greater than one million pounds. Furthermore, member companies have confirmed that U.S. production and importations of barium stearate is decreasing and therefore decline to continue the HPV Challenge sponsorship for this chemical.

The contact for these newly formed groups is Lynne Jones. She can be reached by telephone at 202-721-4157 or by e-mail at jonesl@socma.com.

Sincerely,
/s/
Lynne Jones
Executive Director

Cc: P. Donnelly, Akcros Chemicals
M. Cochran, ATOFINA
L. Kandel, Baerlocher USA, Inc.
W. Koch, Crompton Corporation
A. Olson, Ferro Corporation
S. Zigenfuss, Kemin Industries
S. Grove, OM Group Americas
F. Pelletier, Pelron Corporation
G. Hazelton, Rohm & Haas
B. Pelsor, The Shepherd Chemical Company
D. Shaw, Troy Corporation
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